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CLERK OF DISTRICT COURT
DISTRICT OF ARIZONA

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CR21-02604 TUC-SHR(DTF)

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

10 United States of America,
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12 Plaintiff,
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14 vs.
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16 Shardae Amarie Haynes,
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18 Defendant.

No.

INDICTMENT

VIO: 18 U.S.C. § 554(a)
(Smuggling Goods from the United States)

THE GRAND JURY CHARGES:

On or about November 4, 2020, within the District of Arizona, Defendant SHARDAE AMARIE HAYNES knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, to wit: five 7.62x39mm caliber rifles, four 7.62x39mm caliber pistols, three 5.56 caliber rifles, one Barrett .50 caliber rifle, one .45 ACP caliber pistol, and one 9x19mm caliber pistol, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819, and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

1 In violation of Title 18, United States Code, Section 554(a).

2
3 A TRUE BILL

4 **/s/**

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6 FOREPERSON OF THE GRAND JURY
Dated: October 6, 2021

7 GLENN B. McCORMICK
8 Acting United States Attorney
District of Arizona

9 **/s/**

10 **REDACTED FOR**
PUBLIC DISCLOSURE

11 ANGELA W. WOOLRIDGE
12 Assistant U.S. Attorney
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